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January 29, 2015

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Re: DOJ No. 90-5-2-1-09611 – Semi-annual Report for July 1, 2014 through December 31, 2014

To Whom It May Concern:

Honeywell Resins & Chemicals LLC ("Honeywell") is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins & Chemicals LLC ("consent decree"), the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Paragraph 49 of the consent decree directs Honeywell to submit a semi-annual report with a status of compliance measures identified in Sections V – XIII of the consent decree. This letter is to meet the requirement by submitting the attached semi-annual report (Attachment A).

If you have questions or need additional information, please contact me at (804) 541-5632.

Regards,



Thomas L. Varner Jr.
Corporate Air Specialist

DOCUMENT CERTIFICATION

Facility Name: Honeywell Resins & Chemicals LLC

Facility Location: 905 East Randolph Road, Hopewell, VA 23860

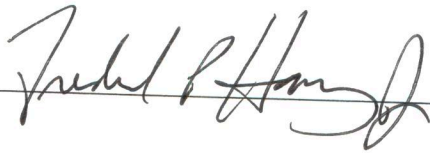
Type of Submittal Attached: Consent Decree Semi-annual Report for July 1, 2014 through December 31, 2014

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official: Frederick P. Harry

Title: Site Manager

Signature:



Date: January 29, 2015

DISTRIBUTION

T. Love

J. Sheridan

Attachment A

Semi-annual Report for July 1, 2014 through December 31, 2014

1. Status of Compliance with Sections V – XIII

Provision	Status
Section V – Area 9 NOx Emission Reductions, Control and Testing	
12. Installation and Operation of first set of NOx Emission Controls (B-Train)	Installation is complete. System is in continuous operation.
13. Installation and Operation of second set of NOx Emission Controls (C-Train)	Installation was completed in early November 2014. System is being operated and is scheduled to be in continuous operation by the 6/30/2015 due date.
14. Installation and Operation of third set of NOx Emission Controls (A-Train)	Project design is in progress. Due 12/31/2016 (installation), 6/30/2017 (operation).
15. Installation and Operation of fourth set of NOx Emission Controls (E-Train)	Project is in the capital forecast. Due 12/31/2018 (installation), 6/30/2019 (operation).
16. Continuous operation of SCRs, within prescribed limits and methods	For installed NOx Emission Controls, the site has operated the systems within the requirements of the consent decree. See Section 2 of this Attachment for a description of problems encountered.
17. Conduct initial performance test on SCRs and report results	For installed SCRs, the site has conducted and submitted performance results. Plans are underway to hold the C-train performance test by the 6/30/2015 due date.
Section VI – Area 9 CEMS Installation and Operation	
18. Replace the existing EMCAMS with the installation / operation of NOx CEMs as installed	The site has replaced EMCAMS where it has installed CEMS.
19. Install, certify, calibrate, maintain and operate NOx CEMs for B-Train	Installation is complete. System is in continuous operation.
19. Install, certify, calibrate, maintain and operate NOx CEMs for C-Train	Installation was completed in early November 2014. System is being operated and is scheduled to be in continuous operation by the 6/30/2015 due date.
19. Install, certify, calibrate, maintain and operate NOx CEMs for A-Train	Project design is in progress. Due 6/30/2017.
19. Install, certify, calibrate, maintain and operate NOx CEMs for E-Train	Project is in the capital forecast. Due 6/30/2019.
20. Conduct Relative Accuracy Test Audits (RATAs) and Compressed Gas Audits (CGAs)	For installed CEMS, the site has conducted and submitted RATAs and quarterly CGAs.
Section VII – Area 9 PM and Opacity Testing and Monitoring	
21. Conduct particulate matter and opacity performance testing and submit testing report	Testing has not started. Plans are underway to complete this testing by the 7/18/2015 due date.
Section VIII – Enhanced Leak Detection and Repair	

22. Implement and comply with the enhanced leak detection and repair plan (ELP)	The site has implemented the enhanced leak detection and repair plan. The first ELP compliance status report was submitted 7/31/2014. See Section 4 of this Attachment for a description of problems encountered.
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Section IX – Benzene Waste NESHAP Audit

23. Complete consent decree measures for BWON audit	The site has completed the BWON audit requirements of Section IX.
24. Submit audit statement of work	Statement of work was submitted and approved.
25. Enter into contract with third party to conduct BWON audit	Under a contract established with Sage Environmental Consulting, the site had the BWON audit completed.
26. Submit third party audit report	The site submitted the BWON audit report to the VADEQ and EPA.
27. Actions if site's TAB is over 10 Mg/yr	The BWON audit determined the site's TAB to be well less than 10 Mg/yr.

Section X – Miscellaneous Operations and Maintenance Measures

28. Submit control and monitoring device preventative maintenance and operations plan, review it annually and update as needed.	Plan was submitted and approved in 2013, and last updated in 2014.
29. Air pollution control practices	Site is implementing good air pollution control practices per the consent decree.
30. Tracking periods of non-operation	Site is keeping written records of startups, shutdowns, malfunctions, non-operation, bypasses per the consent decree.

Section XI – Permits

31. Incorporate consent decree into new source review and Title V permits	An NSR permit has been issued to the site to incorporate the requirements of this consent decree. The site has submitted an application to have its Title V permit updated to incorporate the requirements of the consent decree in the new NSR permit. The Virginia Department of Environmental Quality reissued the Title V permit in October 2014.
32. Obtain required permits	The site obtained a new source review permit requiring the installation of SCRs on A, B, C, and E Trains. The site also reviewed its new Title V Permit in October 2014.

Section XII – Prohibition of Netting Credits or Offsets from Required Controls

33. Summary	The site is compliant with the general netting prohibition provisions of the consent decree.
34. General netting prohibition	
35. Exception to general netting prohibition	
36. Outside the scope of the general netting prohibition	

Section XIII – Environmental Mitigation

37. Operate only Tier III (or equivalent) diesel switcher locomotives	The site is operating only Tier III diesel switcher locomotives.
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38. Offset credit prohibition	The site has not sought to obtain netting credits for the purchase and use of the Tier III locomotives.
39. Certification	The site submitted the diesel switcher certification required by the consent decree.

2. Description of Problems Encountered or Anticipated

The site has not encountered or anticipated any problems meeting the requirements of the consent decree. Below, however, is a description of a problem encountered in the second half of 2014:

TW-8 SCR low ammonia flow during startup – On July 14, 2014, the three-hour rolling average of lbs/hour NOx fell below required the control efficiency during startup. The site notified VDEQ of this issue on July 14, and provided a written report on July 15. The issue occurred while TW-8 was being brought back into service. During the start-up, ammonia flow to CV-31 did not respond quickly enough to the rise in inlet NOx. This caused a spike in outlet NOx and a drop in the measured control efficiency for approximately ten minutes. Despite the SCR dropping below the 95% efficiency, the short-term NOx emissions were still within permitted limits. To minimize emissions, the area quickly adjusted the ammonia feed to a more appropriate level to treat NOx in the SCR. A review of records and logs indicates no reoccurrence of this problem during the remainder of 2014.

3. Status of Permit Applications or Modifications

See above description in Section 31.

4. Description of Changes Not Authorized by Permit or Regulation

None

5. Description of Non-compliance with Consent Decree

On October 6, 2014, the Hopewell site submitted a notification of two potential violations of Appendix A of the consent decree. The first potential violation concerned the daily certification of LDAR results by monitoring technicians (Appendix A paragraph 26), which did not have the specified wording. The second potential violation concerned Quasi-Directed Maintenance (Appendix A paragraph 13), where twice the site took more than one business day after an attempt at repair to remonitor the piece of equipment. For both potential violations, the site took action to correct the issues and prevent a recurrence.

In a December 19, 2014 letter, the Virginia Department of Environmental Quality (VDEQ) requested the site update its LDAR procedures and training requirements to minimize the chances that these potential violations will reoccur. Hopewell site did update its LDAR procedure and training requirements and sent the updated documents to VDEQ on January 22, 2015.

A review of documents and records associated with the Consent Decree did not indicate any other potential violations.